

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA,)	
)	
v.)	
)	No. 20-CR-10098-WGY
BRIAN GILBERT, STEPHANIE POPP,)	
STEPHANIE STOCKWELL and)	
VERONICA ZEA)	
)	
Defendants)	
_____)	

**ASSENTED TO MOTION FOR *PRO HAC VICE* ADMISSION OF
FRANK R. UBHAUS, ESQUIRE**

Pursuant to Local Rule 83.5.3, the undersigned counsel for Defendant Veronica Zea (“Defendant”) respectfully moves this Honorable Court to grant Frank R. Ubhaus, Esq. *pro hac vice* admission in the above-captioned action. The undersigned counsel for Defendant Zea submits the following in support of the instant motion:

1. The undersigned counsel is admitted to practice before this Court and appeared for Defendant Zea in the above-captioned action on September 10, 2020.
2. Frank R. Ubhaus, Esq. of Berliner Cohen, LLP located in San Jose, California has also been retained by Defendant Zea in connection with the above-captioned action.
3. The undersigned counsel will remain as a counsel of record for Defendant Zea in the above-captioned action and moves pursuant to Local Rule 83.5.3 for this Court to grant Frank R. Ubhaus, Esq. *pro hac vice* admission to appear for Defendant Zea.
4. Pursuant to Local Rule 83.5.3, Certification Of Frank R. Ubhaus, Esq. In Support Of Motion For *Pro Hac Vice* Admission is attached hereto as Exhibit A.

5. The undersigned counsel has informed the Government of the within motion prior to its filing and the Government has assented to this motion.

WHEREFORE, on behalf of Defendant Veronica Zea, the undersigned counsel respectfully requests that this Honorable Court grant Frank R. Ubhaus, Esq. *pro hac vice* admission in the above-captioned action.

Dated: September 11, 2020

Respectfully submitted,

VERONICA ZEA,

By her attorney,

/s/ Kristen Schuler Scammon

Kristen Schuler Scammon (BBO #634586)

TORRES, SCAMMON, HINCKS & DAY, LLP

35 India St.

Boston, MA 02110

T: (617) 307-4426

E: kscammon@tshdlegal.com

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1 I, Kristen Schuler Scammon, certify that on September 10, 2020 I conferred by electronic mail with AUSA Seth Kosto regarding this Motion and the United States has assented to this Motion.

/s/ Kristen Schuler Scammon

Kristen Schuler Scammon, Esq.

Certificate of Service

I hereby certify that on this 10th day of September, 2020, this document was filed through the Court's ECF system and will therefore be sent electronically to the registered participants identified in the Notice of Electronic Filing.

/s/ Kristen Schuler Scammon

Kristen Schuler Scammon